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Pratt & Whitney  
N. Berwick Engine Parts Refurbishment Center  
113 Wells Street  
N. Berwick, Maine 03906  
FAA Repair Station WA21 259L

August 20, 1999

United States Department of  
Transportation Dockets  
400 Seventh Street, S.W.  
Room Plaza 401  
Washington, D.C. 20590

RE: Docket No FAA-I 999-5836-44  
Notice No. 99-09

PT OF TRANSPORTATION  
DOCKET SECTION  
59 AUG 26 AM 11:16

Please consider this a Request for Extension of Time for Comments to the above referenced Docket under 14 C.F.R. §11.29(c).

PRATT & WHITNEY UNITED TECHNOLOGIES CORPORATION d/b/a PRATT & WHITNEY, Air Agency Certificate Number WA21259L is involved in the maintenance, and preventive maintenance of civil aviation products, components and parts and is currently certificated under 14 C.F.R. Part 145.

Upon review of the proposed NPRM, we find it too complex and detailed to submit a reasoned response within the time allotted. The proposed changes, including those related to monitoring of suppliers, training, tooling and many other factors will require in depth analysis to fully ascertain the impact upon our business and to respond in a complete and detailed manner. The proposed changes in the requirements for a Repair Station Manual and changes in the Repair Station Rating and Capability List requirements will require additional and continuing administrative burden upon our business.

In order to provide a proper response, each proposed change will need to be analyzed and comment made. We believe that good cause exists to extend the comment period to the maximum allowable. The FAA stated its own observation in the NPRM that this proposed rule had been under consideration since 1975, yet only 120 days were given for response. Considering the financial and compliance impacts upon our business that are contained in the NPRM, we respectfully request the FAA extend its Comment Period, at a minimum, to December 31, 1999.

Sincerely,

Dennis Abbott  
General Manager